

BIANCAMANO LAW, LLC
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Kenilworth, NJ 07083
Attorneys for Defendant, Darryl Dancy

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA, : Honorable Kevin McNulty, U.S.D.J.
: vs. : Crim. No.: 19-658-KM-1
DARRYL DANCY :
: Defendant. :
: : **NOTICE OF
PRETRIAL MOTIONS**
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TO: Sarah A. Sulkowski, A.U.S.A.
United States Attorney's Office
970 Broad Street,
Newark, NJ 07102

PLEASE TAKE NOTICE that defendant Darryl Dancy will move, by and through counsel, Daniel Holzapfel, Esq. and Stacy Biancamano, Esq. of the firm Biancamano Law, LLC, before the Honorable Kevin McNulty, U.S.D.J. at the United States District Court for the District of New Jersey, 50 Walnut Street, Newark, NJ 07102, for an Order granting the following relief:

1. Dismissal of the Superseding Indictment / Dismissal of specific Counts of the Superseding Indictment;
2. A Franks hearing;
3. Compelling disclosure of the CI's confidential source / confidential informant file and or permitting in camera review of same;

4. Compelling production of all discoverable materials in the files of the Essex County and Union County Prosecutor's Offices;
5. Directing the preservation and disclosure of agents' rough notes and contemporaneous materials;
6. Compelling disclosure of grand jury transcripts for both the initial and superseding indictments;
7. Compelling disclosure of any correspondence between the US Attorney's Office and Essex County Prosecutor's Office regarding the decision for this matter to be adopted federally;
8. Compelling early production of Jencks Act materials;
9. Compelling early disclosure of 404(b) material;
10. Suppressing any pretrial statements by Mr. Dancy;
11. Permitting the filing of additional motions and/or supplementation of motions as the need arises in advance of trial;
12. A hearing to address these issues.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Mr. Dancy will rely upon the Brief and oral argument of Counsel.

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By: s/ Daniel J. Holzapfel
Daniel J. Holzapfel, Esq.

Dated: November 7, 2022